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To: Federal Communications Commissions

Subject: Object: WT Dockset 04-344

Gentlemen:

We strongly urge the F.C.C. to waive the Part 80 Rules to allow the use of Class B AIS. We believe the F.C.C. should adhere to IEC-62287-1 specification and ask for the U.S. Coast Guard to review Class B AIS submittals before allowing Class B AIS equipment to be used in U.S. Waters by U.S. flag vessels.

It should be noted that Non-American flag vessels that are Solas classed are using Class A AIS equipment, such equipment was approved by vessels flag state and not the F.C.C., this equipment works satisfactorily.

We believe Class B AIS should have the following characteristics:

- Meet IEC-62287-1 Specification.
- Have safe guarding means to input MMSI number.
- Ability to interface with PC's, and chart plotters, and radar displays, through NMEA/RS422 and RS237 inputs.
- Have prior approval from European flag state.
- Have ability to operate in marine environment.
- Receive GPS Input.
- Receive and transmit adequate range, at least 5 miles.
- Have adequate RFI enclosure.

Robert E. Negron

President